IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

UNITED STATES OF AMERICA

v. Case No. 1:20-cr-260-6-LMB

CARLOS JOSE TURCIOS VILLATORO,

Defendant.

CONSENT MOTION TO EXTEND DEADLINE TO FILE MOTION

The pretrial motions deadline in this case is today, July 14, 2023. Counsel is preparing a motion to suppress evidence obtained from several Facebook search warrants. Materials related to one of those warrants was produced in this case, and material related to two others were produced in another case. Due to a mutual misunderstanding between the parties, not all counsel had all of the warrants. In conferring about the filing of today's motion, the parties realized the misunderstanding and have since worked collaboratively to resolve the issue. However, in light of this issue, the accused, Jose Villatoro requests an extension until Monday, July 17, 2023, to review the materials and file his motion to suppress related to the Facebook search warrants. The government consents to this request. A proposed order is attached.

Thank you,

CARLOS JOSE TURICIOS VILLATORO By Counsel

By:

/s/ MM Pha-Elizabeth L. Van Pelt Virginia Bar No. 82750 Delaware Bar No. 6117 District of Columbia Bar No. 1615865 libbey@libbeyvanpeltlaw.com LIBBEY VAN PELT LAW, PLLC 3033 Wilson Boulevard, Suite 700 Arlington, VA 22201 (571) 356-9066

Robert J. Wagner Virginia Bar No. 27493 robwagnerlaw@gmail.com ROBERT J. WAGNER, PLC 101 Shockoe Slip, Suite J Richmond, VA 23219 (804) 814-8172

CERTIFICATE OF SERVICE

I certify that on July 14, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which sends a notification of filing (NEF) to all counsel of record.

_/s/ **L** Van Pelt